REMARKS

Claims 1-21 are pending. Reconsideration and allowance of the above-identified application are respectfully requested. Claim 4, 8, 10, 12, 13 and 21 have been amended to correct a typographical error. New claims 22-24 have been added to provide a more complete scope of protection. Support for claim 24 is provided in paragraph [0008] of the specification (e.g., automatically via Caller-ID). Upon entry of this Amendment, claims 1, 2, 9, 18 and 19 have been amended to overcome the rejections under 35 U.S.C. § 112, second paragraph set forth in the office action. Accordingly, entry of these amendments and withdrawal of this basis for rejecting the claims 1, 2, 9 and 18 are respectfully requested.

In the Office Action, claims 1-21 are rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 5,555,299, to Maloney et al (hereinafter referred to as the Maloney et al patent). Applicants respectfully submit that the Maloney patent fails to teach or suggest several claimed features of the invention.

The Maloney et al patent discloses a system for transferring calls and call-related data between call centers. First, the Maloney et al patent fails to teach or suggest a transaction session performed by a user accessing a data source in multiple phases, as recited independent claims 1 and 19 and dependent claims 2, 10, 14, 17 and 21. With reference to Fig. 5 and the text at column 7, line 42 through column 8, line 57 of the Maloney et al patent, a call is never terminated unless no further transfer is necessary between call service representatives (CSRs) (see blocks 112 abd 144 in Fig. 5 of Maloney et al). Thus, the caller has only one session with a CSR, or other CSRs if transferred, but never hangs up or calls back (e.g., initiates another phase as permitted by the claimed invention).

Second, the Maloney et al patent fails to teach or suggest storing session data relating to a transaction session that is used to allow a user to drop a call and then call back and continue the transaction session at a later time, as recited in independent claim 1, or map subsequent interaction sessions initiated by a user with the transaction session as recited in independent claims 9 and 18. The Maloney et al patent is silent

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as to whether the data entered in the transfer screen by the CSR is saved even after the caller hangs up. The caller may be able to call a main number and request to be transferred to the last CSR to which he spoke, or request and later dial the direct number of the last CSR, but would not be able to automatically continue the previous call. By contrast, a user can hang up and automatically rejoin a transaction session via a subsequent interaction session as recited in claims 1, 9 and 18.

Third, the Maloney et al patent fails to teach or suggest storing transaction session data independently of the information site, the application site, the business logic, the client device, and the access medium employed by the client device to establish an interaction session to participate in the transaction, as recited in independent claims 9 and 19. The Maloney et al patent teaches a method of saving a customer's data spoken to a CSR into a database under a unique identifier, and then passing that identifier around to different CSRs as the call is transferred. This technique relies on a human being to accomplish the business logic (e.g., interact with the customer) and, as part of that interaction, store the customer's data into a database. The combination of the CSR (i.e., agent), the software that the agent is using, and the database can be considered one back-end system. To accomplish state preservation, this back-end system, and namely the agent(s) or CSR(s), must store each step of the transaction itself. Thus, the call data and transfer data is not stored independently of the information site of the CSR, the business logic or caller/CSR interaction, the client device or caller, and the access medium employed by the caller. In the Maloney et al system, the CSR(s) is aware that he must maintain the customer information. The present invention, by contrast, does not require the back-end application to have responsibility for state preservation.

Further, by contrast, the Session Management Gateway of the present invention maintains an interaction session with an application in a database even if no client device is connected at that moment to the session pertaining to the transaction. With reference to Fig. 1 in the present application to exemplify the claimed invention, a Session Management Gateway or SMG (7) interacts with an application (9) from the

one side (e.g., using standard Internet protocols for connection to Internet based applications), and multiple client interfaces such as a Telephone Interface (3) or a Data Device interface (5) from the other side. The SMG maintains the transaction session with the application (9) separate from interaction sessions with client devices, and therefore can maintain the interaction session with the application (9) in a database (8) even if no client device is connected at that moment to the session pertaining to the said transaction, as recited in dependent claims 7, 8, 12-14 and 20. According to the present invention, the back-end system (e.g., the application or interaction sites such as the back-end data server 10 in Fig. 3 of the application) does not act in any way to store the state of a transaction in between subsequent calls. Quite to the contrary, it is the Session Management gateway that supplies the back-end system with the correct state data for each phase of the transaction. Thus, due to the SMG, transaction session data is stored independently of the information site, the application site, the business logic, the client device, and the access medium employed by the client device to establish an interaction session to participate in the transaction, as recited in claims 9 and 19.

In addition, while the Maloney et al patent teaches how a computer-readable storage device can store a customer's data, this is not the same as having the customer's transaction state stored independent of the back-end system, that is, the CSR, and the CSR workstation with the software and database.

Finally, the Maloney et al patent teaches how a CSR can access a user's records from a computer while talking to the customer on a telephone. The customer, however, merely interacts with the CSR(s) via a telephone. Thus, the Maloney et al does not teach how a customer can access the same transaction session from various devices such as a telephone and a data device at the same time or at respective times as recited in dependent claim 2. The current invention allows a user to continue the same transaction from various devices without the back-end application being aware that the user has switched client devices.

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With regard to claim 1, the office action states that the Maloney et al patent purportedly teaches that a call is "put on hold/dropped then a separate agent call is performed." This is incorrect. The call may be put on hold for the transfer, but cannot be dropped and then automatically reconnected to the transferee CSR. As stated above, a caller could call back after a dropped call and would not automatically be returned to the prior transaction session. The Maloney et al patent is silent regarding the maintenance of data regarding a transferred call after call termination.

Regarding claim 2, the office action states that the caller uses a phone and interactive computer to access the system. This is incorrect. The caller uses only a telephone. The CSR may use a telephone and a computer, but the grounds for claims rejections apparently analogizes the CSR as the element that purportedly supports a transaction session with different client interaction sessions and not the caller. Further, claim 2 recites a caller using different devices to access the system during respective ones of multiple phases. For the reasons stated above, the system disclosed in Maloney et al patent does not support multiple phases to a transaction as claimed, nor a caller accessing a CSR using anything other than a phone and corresponding incoming line to the PBX/ACD. Neither the CSR nor the ACD/PBX in the Maloney et al patent support a transaction session with different client interaction sessions as claimed. As stated above, the call is not terminated during transfer per Fig. 5.

Regarding claim 3, the Maloney et al patent teaches the use of a voice identifier using DNIS and/or ISDN D-channel protocol principles (see column 8, lines 1-2). The voice identifier is being used by the back-end system (i.e., the CSR) to recognize the user. By contrast, the claimed invention uses session data comprising user identification data (as recited in claim 1) that is stored in a memory device corresponding to a session management gateway (as recited in claim 5) from which claims 3 and 6 depend. Thus, the user identification data is used by the gateway of the present invention to recognize the user and not used by the back-end as in the Maloney et al patent. The gateway of the present invention is advantageous because it removes the responsibility for state preservation (e.g., maintaining transaction session

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data) from the back-end. Thus, the identifier in the Maloney et al patent does not teach or suggest any of the elements recited in claim 3 for a user identifier based on the client device.
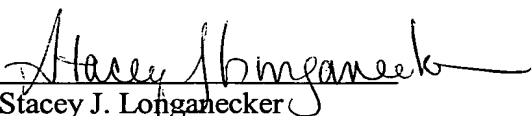
Regarding claim 4, the termination with a first CC after transfer to another CC does not constitute a call being dropped, as suggested in the office action. The call itself is not terminated for transfer purposes. The caller merely stops speaking with the current CSR to be transferred during the same call to another CSR.

Regarding claims 5-13 and 16-21, the Maloney et al patent does not disclose or suggest a session management gateway as claimed. None of the ACD/PBX, CSR workstation, file and comm. server or any other device in Fig. 2 of the Maloney et al patent stores session data or maintains a transaction session as claimed for the reasons stated above.

Accordingly, withdrawal of 35 U.S.C. §103(a) basis for rejecting the claims 1-21 is respectfully requested.

In view of the above, it is believed that the application is in condition for allowance and notice to this effect is respectfully requested. Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the telephone number indicated below.

Respectfully submitted,

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